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Illinois Environmental Protection Agency



FACSIMILE TRANSMITTAL SHEET

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DATE:

Oct 12, 2005

TO:

Vernita Simon

FROM:

Bruce Everetts

COMPANY:

U.S. EPA

COMPANY:

BOL / LCU 05E

FAX NUMBER:

312-353-9176

SENDER'S FAX NUMBER:

(217) 557-1165

PHONE NUMBER:

217 524-1663

SENDER'S PHONE NUMBER:

~~(217) 782-6762~~

MESSAGE

Attached is ARAR3 for Calumet Container.

I'll be sending a hard copy of this letter for
your files.

B. Everetts



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 - (217) 782-3397

JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601 - (312) 814-6026

ROD R. BLAGOJEVICH, GOVERNOR

DOUGLAS P. SCOTT, DIRECTOR

October 12, 2005

Ms. Vernita Simon
U.S. Environmental Protection Agency
Region V
77 West Jackson Boulevard, SE-5J
Chicago, IL 60604

Dear Ms. Simon:

Per your request, Illinois EPA is identifying Applicable, Relevant, and Appropriate Requirements (ARAR's) for the Calumet Container site in Chicago, Illinois. Throughout this time-critical removal activity, please forward to me Action Memo's, Removal Action Report's, weekly POLREPS, and other relevant site information in order to keep the Illinois EPA Bureau of Land files current and accurate. If site assessment activities are warranted at this site, please contact me as soon as possible.

To assist U.S. EPA, the Agency has identified the following State ARAR's for the immediate removal of containers from the sites located in Chicago. Containers include drums, tanks, and roll-off-boxes. For the ARAR's listed in the attachment to this letter, USEPA is considered to be the generator of the waste.

In Illinois, our Resource Conservation and Recovery Act (RCRA) regulations are essentially identical to the Federal RCRA regulations. The essential difference between the Federal and State ARAR's for solid wastes is the classification of Special Waste in Illinois.

Should you have site-specific questions or additional requests from Illinois EPA please contact me at 217-524-1663.

Sincerely,

Bruce Everetts
Office of Site Evaluation
Division of Remediation Management
Bureau of Land

attachments

cc: Division File

**STATE of ILLINOIS ARARs
for
IMMEDIATE REMOVALS of CONTAINERS**

Regulatory Citation	Requirement
	Determine the Regulatory Classification of the material
35 IAC 722.111 (40 CFR 262.11)	The generator of a solid waste must determine whether it is a hazardous waste.
35 IAC 808.110	The waste will probably be classified as a Special Waste. Special wastes are hazardous wastes, industrial process wastes, and pollution control wastes. Pollution control wastes include contaminated media.
	Obtain IEPA & USEPA Identification Numbers
35 IAC 722.112 (40 CFR 262.12)	A generator must obtain a USEPA identification number prior to transporting hazardous waste off-site.
35 IAC 809.501	A generator must obtain an IEPA identification number in order to properly complete an Illinois manifest.
	Transportation of Wastes Off-Site
35 IAC 723.120 (40 CFR 263.20)	Hazardous waste must be manifested to a facility that is permitted to accept it.
35 IAC 809.501	Special waste must be manifested to a facility that is permitted to accept it.
35 IAC 809.201	All vehicles that haul special waste on public highways in Illinois must have a Special Waste Hauling Permit.
	On-Site Management of Wastes
35 IAC 722.134 (40 CFR 262.34)	Containers of hazardous waste can be stored on-site for less than 90 days without obtaining a permit or interim status provided that they are managed in accordance with the requirements at 35 IAC Part 725, Subpart I:

STATE of ILLINOIS ARARs
for
IMMEDIATE REMOVALS of CONTAINERS

Regulatory Citation	Requirement
	<ul style="list-style-type: none"> - the containers must be in good condition (non-leaking), - the containers must be compatible with the wastes placed in them, - the containers must always be closed except when it is necessary to add or remove waste, - the containers must not be opened, or managed in a way that may cause them to rupture or leak, - the containers must be inspected weekly, - incompatible wastes must not be placed in the same container, - a container of waste that is incompatible with other wastes must be separated from the other wastes, - containers of ignitable or reactive waste must be located at least 50 feet from the property line,
35 IAC 722.134 (40 CFR 262.34)	The 90 day exclusion only applies to wastes that are managed in containers, tanks, drip pads or containment buildings. Hazardous waste that is placed on the ground is subject to all of the regulations for a waste pile as soon as it is placed on the ground.